

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

PARAGON COMPONENT SYSTEMS, LLC,)	JUDGE CHARLES E. ATCHLEY, JR.
)	
)	
Plaintiff,)	
v.)	CIVIL ACTION NO.:
)	1:24-CV-00246-CEA-CHS
QUALTIM, INC., et al.,)	
)	
Defendants.)	

**DEFENDANTS’ MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION,
IMPROPER VENUE, AND FAILURE TO JOIN NECESSARY PARTIES, OR
ALTERNATIVELY, TO TRANSFER VENUE**

Pursuant to Rules 12(b)(2), 12(b)(3), and 12(b)(7) of the Federal Rules of Civil Procedure and 28 U.S.C. § 1406(a), Defendants Qualtim, Inc., Center for Building Innovation, LLC, DrJ Engineering, LLC, Inspired Pursuits, LLC, Kirk Grundahl, and Suzanne Grundahl (collectively, “Defendants”), through undersigned counsel, hereby move to dismiss the Complaint of Plaintiff Paragon Component Systems, LLC for lack of personal jurisdiction, improper venue, and failure to join necessary parties, or alternatively, to transfer this matter to the Western District of Wisconsin.

The Complaint, supporting brief, and declarations attached to this motion establish that personal jurisdiction does not exist over Defendants in Tennessee for a variety of reasons, including the fact that Defendants’ activities at issue in this case took place in Wisconsin – and not Tennessee. Thus, this action should be dismissed. For related reasons, dismissal is proper and warranted because of improper venue. Alternatively, again based upon Defendants’ activities in Wisconsin (and not Tennessee), this action should be transferred to the Western District of Wisconsin.

DATED this 1st day of October, 2024.

Respectfully submitted,

/s/ Shayne R. Clinton

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Center for Building Innovation, LLC, DrJ
Engineering, LLC, Inspired Pursuits, LLC,
Kirk Grundahl, and Suzanne Grundahl*

CERTIFICATION

Pursuant to this Court's Order issued on July 24, 2024 entitled "Order Governing Motions to Dismiss" (R. Doc. 4), the undersigned attorney gives notice to this Court and certifies that prior to filing this Motion, he has conferred with counsel for Plaintiff to determine whether an amendment to the Complaint could cure the deficiency, and after conferring, the parties have been unable to agree that the Complaint is curable by a permissible amendment or dismissal.

/s/ Thomas G. Pasternak

Thomas G. Pasternak
Attorney for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/ Shayne R. Clinton